



Driving progress
through partnership

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Via ECF

Honorable John P. Mastando
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: *In re Eletson Holdings, Inc., et al.*, Bankr. S.D.N.Y. 1:23-bk-10322 (JPM)

Dear Judge Mastando:

We write in response to the *Petitioning Creditors' Reservation of Rights Regarding the Stipulation Between the Office of United States Trustee and Reed Smith LLP* (Dkt. No. 1222) (the "PC ROR") and *Statement and Reservation of Rights of the Official Committee of Unsecured Creditors to the Stipulation Between the Office of the United States Trustee and Reed Smith LLP* (Dkt. No. 1224) (the "Committee ROR"). Reed Smith LLP ("Reed Smith") objects to the PC ROR and Committee ROR insofar as they mischaracterize Reed Smith's disclosures and/or "connections" regarding non-Debtors entities and/or individuals.

As to the PC ROR, Reed Smith advised the District Court of Eletson Gas LLC's ("Gas") position based on Reed Smith's representation of Gas in the LCIA proceedings. This representation of Gas has been previously and fully disclosed to this Court (*see* Dkt. 235-2). Further, to be clear, Reed Smith understands that Sidley Austin LLP, or another law firm, may be representing the Preferred Nominees in the District Court confirmation proceedings (*see* Dkt. 1222 at 5). Petitioning Creditors' suggestion that Reed Smith is representing them is deliberately and knowingly false.

The Committee ROR, too, misrepresents Reed Smith's disclosures and simply re-hashes arguments it has made regarding the preferred shares of Gas for over year, and which are entirely without merit.

Respectfully submitted,

Louis M. Solomon